

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
---	------------------------------------

This document relates to: All Actions

**PLAINTIFFS' AMENDED WITNESS DISCLOSURE PURSUANT TO THE COURT'S
JANUARY 31, 2018 DEPOSITION PROTOCOL ORDER (ECF NO. 3894)**

Pursuant to the Court's January 31, 2018 Deposition Protocol Order ¶ 6 (ECF No. 3894), and the Court's February 27, 2018 Order (ECF No. 3909), plaintiffs in all actions in this MDL submit the following amended disclosures under Federal Rule of Civil Procedure 26(a)(1)(A)(i). Plaintiffs make these disclosures based on information currently available to them.¹ Plaintiffs reserve their right, under the Federal Rules of Civil Procedure, to further supplement these disclosures as additional information becomes known.

**I. INDIVIDUALS WITH KNOWLEDGE CONCERNING THE ACTIVITIES OF
THE MERITS DISCOVERY DEFENDANTS**

Plaintiffs in these consolidated proceedings identify the following individuals as those who may have discoverable information concerning the terror sponsorship activities of the merits discovery defendants, and whose testimony may presently be secured through subpoena, notice of deposition, or on a cooperative basis. Plaintiffs do not consent to or authorize any communication prohibited by any applicable rule of professional conduct.

¹ Identification of any individual on this list is not intended to indicate that plaintiffs have secured the cooperation of the person to testify as a witness or that plaintiffs have had sufficient contact with or control over the individual to make the individual available as a witness.

A. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Muslim World League (“MWL”). Individuals include, but are not limited to:

1. Dr. Abdullah bin Abdul Mohsen al Turki
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.
Subject: Dr. Turki served as Secretary General of the Muslim World League (“MWL”) from approximately 2000-2016. Accordingly, Dr. Turki has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization (“IIRO”); and (iii) the allegations, investigations, and facts concerning the MWL and IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Further, Dr. Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. Turki’s authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities’ provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Turki has knowledge and information regarding the MWL’s relationship with, and employment of, Wa’el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden). Dr. Turki also served as the Deputy Chairman of the MWL’s Islamic Fiqh Council and thus has knowledge and information regarding fatwas issued by the Fiqh Council encouraging “armed Jihad” against the “enemies of [Islam].”
2. Dr. Abdullah bin Saleh al Obaid
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.
Subject: Dr. Obaid served as Secretary General of the MWL from approximately 1995-2000. In a 1997 interview published in the MWL’s own newspaper, Dr. al Obaid himself acknowledged that charges of terrorism sponsorship had been leveled against the Saudi charities, including the MWL. Dr. Obaid further served as the head of the MWL’s branch office in the United States, located at 360 S. Washington Street, Suite 300, Falls Church, VA 22046. Accordingly, Dr. Obaid has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization (“IIRO”); and (iii) the allegations, investigations, and facts concerning the MWL and IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr.

Obaid has knowledge and information regarding the MWL's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

3. Dr. Abdullah Omar Naseef

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.

Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization ("IIRO"); (iii) the allegations, investigations, and facts concerning the MWL's and IIRO's presence in Pakistan and Afghanistan during the Soviet-Afghan war and their activities in support of the mujahideen fighters; and (iv) the allegations, investigations, and facts concerning the MWL and IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Naseef has knowledge and information regarding the MWL's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden). Dr. Naseef also served as the Deputy Chairman of the MWL's Islamic Fiqh Council and thus has knowledge and information regarding fatwas issued by the Fiqh Council encouraging "armed Jihad" against the "enemies of [Islam]."

4. Prince Talal bin Abdulaziz al Saud

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Prince Talal served as a member of the Board of Directors of Rabita Trust, a subsidiary of the MWL. Accordingly, Prince Talal has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

5. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2004.

Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.

Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Wa'el Hamza Jelaidan

Address: Upon information and belief, the individual resides in the Kingdom of

Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: According to Jelaidan's Curriculum Vitae, he was a Director for the MWL from approximately 1989-1994. The MWL is the parent organization of the IIRO. Jelaidan also ran the IIRO's branch office in Peshawar, Pakistan, and maintained close ties with the Director of the IIRO's branch office in the Philippines, Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups). Jelaidan further served as the Secretary General of the Saudi Joint Relief Committee ("SJRC") which had a financial relationship with the IIRO in Albania and Kosovo. Jelaidan also has ties to the MWL and IIRO branch offices in Afghanistan, Albania, and Kosovo. Accordingly, Jelaidan has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Jelaidan further has knowledge and information regarding the MWL's and IIRO's relationship with, and employment of, Mohammed Jamal Khalifa.

7. Dr. Ahmed Muhammad Ali

Address: Unknown.

Subject: Dr. Ali served as the Secretary General of the MWL from approximately 1993-1995, and further served as a member of the IIRO's Board of Directors.

Accordingly, Dr. Ali has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Sheikh Muhammad bin Nasser al Aboudi

Address: Unknown.

Subject: Sheikh Aboudi served as the MWL's Deputy Secretary General and as a member of the MWL's World Supreme Council for Mosques. Sheikh Aboudi further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Aboudi has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Dr. Abd al Rahman Habanka al Midani

Address: Unknown.

Subject: Dr. Midani served as a member of the MWL Constituent Council and further served as a member of the IIRO's Board of Directors. Accordingly, Dr. Midani has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial

and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Dr. Hassan bin Ali al Ahadal
Address: Unknown.
Subject: Dr. Ahadal served as the MWL's Financial and Administrative Affairs Manager and the MWL Secretary General's Office Director. Dr. Ahadal further served as a member of the IIRO's Board of Directors. Accordingly, Dr. Ahadal has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
11. Dr. Saleh bin Zabin al Marzooqi al Buqami
Address: Unknown.
Subject: Dr. Buqami served as the Secretary General of the MWL's Islamic Fiqh Council. Accordingly, Dr. Buqami has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); (ii) fatwas issued by the Fiqh Council encouraging "armed Jihad" against the "enemies of [Islam];" and (iii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
12. Sheikh Saleh bin Abdul Aziz al Sheikh
Address: Unknown.
Subject: Sheikh served as the Chairman of the MWL's Islamic Fiqh Council, and further served as the Kingdom of Saudi Arabia's Minister of Islamic Affairs. Accordingly, Sheikh has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); (ii) fatwas issued by the Fiqh Council encouraging "armed Jihad" against the "enemies of [Islam];" and (iii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
13. Additional Members of MWL's Islamic Fiqh Council
Address: Unknown.
Subject: Individuals who served as members of the MWL's Islamic Fiqh Council from 1992-2004, have knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); (ii) fatwas issued by the Fiqh Council encouraging "armed Jihad" against the "enemies of [Islam];" and (iii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
14. Sheikh Hassan bin Ali Said Marfak
Address: Unknown.
Subject: Sheikh Marfak served as a member of the MWL Constituent Council and

further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Marfak has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

15. Sheikh Abd al Rahman Yaakub

Address: Unknown.

Subject: Sheikh Yaakub served as a member of the MWL Constituent Council and further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Yaakub has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Sheikh Khaled Kiba

Address: Unknown.

Subject: Sheikh Kiba served as a member of the MWL Constituent Council and further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Kiba has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

17. Abdullah M. Noshan

Address: Unknown.

Subject: Noshan served as the Director of the MWL's branch office in the United States. Accordingly, Noshan has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

18. Khalid M. Fadllala

Address: Unknown.

Subject: Fadllala served as the Secretary and Treasurer of the MWL's branch office in the United States. Accordingly, Fadllala has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

19. Dr. Saleh H. Saqri

Address: Unknown.

Subject: Saqri served as the Director of the MWL's branch office in New York

from 1989-1999. Accordingly, Saqri has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. Abd al Bassat Az al Din

Address: Unknown.

Subject: Din served as the Director of the MWL's branch office in London. Accordingly, Din has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

21. Abd al Hadi Daguit

Address: Unknown.

Subject: Daguit served as the Director of the MWL's branch office in Manila, Philippines following Mohammed Jamal Khalifa, brother-in-law to Osama bin Laden and senior al Qaeda member. According to the U.S. government, Daguit was "a trusted associate of Khalifa." Accordingly, Daguit has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. Abd al Qadr Abdullah

Address: Unknown.

Subject: Abdullah served as the MWL's representative in the Philippines in the early 1990s. Accordingly, Abdullah has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

23. Abdullah bin Ibrahim al Sahibani

Address: Unknown.

Subject: Sahibani served as the Director of the MWL's branch office in Indonesia from 1997-2002. Accordingly, Sahibani has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

24. Fauzi bin Hassan bin Muhammad Jamal

Address: Unknown.

Subject: Jamal served as the Director of the MWL's branch office in Indonesia from 2002-2004. Accordingly, Jamal has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

25. Fahd bin Muhammad Sand al Harbi
Address: Unknown.
Subject: Harbi served as the Director of the MWL's branch office in Indonesia beginning in 2004. Accordingly, Harbi has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
26. Bassam A. Alim
Address: Unknown.
Subject: Alim served as the Director of the MWL's branch office in the United States. Accordingly, Alim has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
27. Amin Aqeel Attas
Address: Unknown.
Subject: Attas served as the MWL's Assistant Secretary General for Finance and Administration and as a member of the MWL's World Supreme Council for Mosques. Accordingly, Attas has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
28. Abd al Aziz Bashawari
Address: Unknown.
Subject: Bashawari served as the Director of the MWL's Financing and Monitoring Administration. Accordingly, Bashawari has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
29. Nabil bin Jamil Qutub
Address: Unknown.
Subject: Qutub served as the Director of the MWL's Finance Department. Accordingly, Qutub has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
30. Hamad Moussa
Address: Unknown.
Subject: Moussa served in the MWL's Secret Office ("Al Maktab Al Siri"). Accordingly, Moussa has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts

concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

31. Muhammad Ahmad al Hassani
Address: Unknown.
Subject: Hassani served as the Director of the MWL's Overseas Offices and Centers Administration. Accordingly, Hassani has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
32. Yahiya bin Abbas Auon
Address: Unknown.
Subject: Auon served as the Director of the MWL's Mosques Administration. Accordingly, Auon has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
33. Hassan Uthman Mnjeja
Address: Unknown.
Subject: Mnjeja served as the Director of the MWL's branch office in Tanzania. Accordingly, Mnjeja has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
34. Basit Madani
Address: Unknown.
Subject: Madani served as member of the joint MWL/IIRO envoy to Afghanistan in 2000. Accordingly, Madani has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
35. Ahmed Khalifa
Address: Unknown.
Subject: Khalifa served as member of the joint MWL/IIRO envoy to Afghanistan in 2000. Accordingly, Khalifa has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
36. Jamal al Fadl
Address: Upon information and belief, the individual is currently in witness protection and can be contacted through the U.S. Department of Justice.

Subject: Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Fadl has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Details of Fadl's knowledge are presented in his publicly available interrogation, interviews, court testimony, and FBI 302 statements.

37. Wadih El Hage

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: El Hage is a former employee of the MWL, a former leader of an East African al Qaeda cell, and served as Osama bin Laden's personal secretary. El Hage was convicted for his role in the 1998 U.S. Embassy bombings in Africa. El Hage has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

38. Enaam Arnaout

Address: Upon information and belief, the individual currently resides in Illinois.

Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 13224 Specially Designated Global Terrorist ("SDGT") entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

39. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Law Office of Steven Barentzen, 1750 K Street, N.W., Suite 700, Washington, D.C. 20006.

Subject: In the years leading up to the September 11, 2001 terrorist attacks, Mirza served in various positions with the MWL's branch office in the United States – Director, Secretary, Treasurer, and Registered Agent. Mirza has knowledge and

information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Additionally, Mirza served as a long-time board member for Sana-Bell, Inc. and Sanabel al Kheer, Inc. Officials from the MWL and IIRO simultaneously held positions on those boards with Mirza, thus giving him further knowledge and information regarding the operations, policies, and activities of the MWL and IIRO.

40. Zacarias Moussaoui

Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.

Subject: Moussaoui was an important figure within al Qaeda who had direct access and interactions with Osama bin Laden, Khalid Sheikh Mohammad, and other al Qaeda leadership. Moussaoui spent extensive time in Afghanistan around the al Qaeda leadership and trained at al Qaeda camps in the years leading up to the September 11th attacks. Osama bin Laden personally selected Moussaoui to create a database of financial donors to al Qaeda, which included the MWL.

Accordingly, Moussaoui has knowledge and information regarding the MWL's activities, including the allegations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

41. Stuart A. Levey

Address: Upon information and belief, the individual can be contacted through HSBC, 8 Canada Square, 42nd Floor, London, E14 5HQ, United Kingdom.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

42. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information

regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

43. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through Green River Hollow Consulting, 446 Overlook Drive, Hillsdale, NY 12529.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

44. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

45. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States

government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Szubin further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups." Mr. Szubin became Treasury's Under Secretary for Terrorism and Financial Intelligence in 2015.

46. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

47. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20036.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

48. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Mr. Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Mr. Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to

the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Mr. Fitzgerald has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Mr. Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

49. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Center for Security Studies ("CSS"), but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

50. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on

Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

51. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Suite 1000, Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

52. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and

facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

53. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 1440 New York Avenue, N.W. Washington, D.C. 20005.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center ("NCTC") on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter's leadership, served as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC were responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the Muslim World League, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

54. Mark Rossini

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Rossini is a former FBI Special Agent who served as the FBI's liaison to the Central Intelligence Agency's Bin Laden Issue Station. Mr. Rossini has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

55. Muslim World League ("MWL")

Address: The MWL is represented by Lewis Baach Kaufmann Middlemiss, PLLC, 1899 Pennsylvania Avenue, N.W., Suite 600, Washington, D.C. 20006.

Subject: Representative(s) designated by the MWL to testify to matters to be described in plaintiffs' Notice of Rule 30(b)(6) Deposition.

56. Federal Bureau of Investigation ("FBI")

Address: The FBI is located at 935 Pennsylvania Avenue, N.W., Washington, D.C. 20535.

Subject: Representative(s) designated by the FBI to testify pursuant to Rule 30(b)(6), relevant to the claims against the MWL.

57. U.S. Department of the Treasury

Address: The Treasury Department is located at 1500 Pennsylvania Avenue, N.W., Washington, D.C. 20220.

Subject: Representative(s) designated by the Treasury Department to testify pursuant to Rule 30(b)(6), relevant to the claims against the MWL.

58. U.S. Department of State

Address: The State Department is located at 2201 C Street, N.W., Washington, D.C. 20520.

Subject: Representative(s) designated by the State Department to testify pursuant to Rule 30(b)(6), relevant to the claims against the MWL.

59. Central Intelligence Agency (“CIA”)

Address: The CIA is located at 1000 Colonial Farm Road, Langley, VA 22101.

Subject: Representative(s) designated by the CIA to testify pursuant to Rule 30(b)(6), relevant to the claims against the MWL.

60. U.S. Department of Defense (“DOD”)

Address: The DOD is located at The Pentagon, Washington, D.C. 22202.

Subject: Representative(s) designated by the DOD to testify pursuant to Rule 30(b)(6), relevant to the claims against the MWL.

B. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the International Islamic Relief Organization (“IIRO”). Individuals include, but are not limited to:

1. Dr. Adnan Khalil Basha

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.

Subject: Dr. Basha served for many years as Secretary General of the International Islamic Relief Organization (“IIRO”), beginning in 1997. Given his long tenure with the IIRO and his simultaneous relationship with the MWL (IIRO’s parent organization), Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO and MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Dr. Basha further has knowledge and information regarding the following: (i) IIRO’s relationship with, and employment of, al Qaeda senior members Wa’el Hamza Jelaidan and Mohammed Jamal Khalifa; (ii) IIRO’s support for al Qaeda fighters and their training camps in Afghanistan, Bosnia, Pakistan, Kashmir, and other regions; (iii) IIRO’s relationship with, and employment of, Executive Order 13224 designee Abd al Hamid Sulaiman al Mujil; (iv) IIRO’s support for al Qaeda and affiliated terror groups through the IIRO’s branch offices in the Philippines and Indonesia; and (v) IIRO’s support to the Taliban. Dr. Basha also served as a member of the IIRO’s Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities

of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

2. Dr. Abdullah bin Abdul Mohsen al Turki

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.

Subject: Dr. Turki served as Secretary General of the MWL from approximately 2000-2016, the parent organization of the IIRO. Accordingly, Dr. Turki has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Further, Dr. Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. Turki's authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities' provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Turki has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden) and Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).

3. Dr. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.

Subject: Dr. Obaid served as Secretary General of the MWL from approximately 1995-2000, the parent organization of the IIRO. Dr. Obaid further served as President of the IIRO Executive Council. Accordingly, Dr. Obaid has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Obaid has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden) and Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).

4. Dr. Abdullah Omar Naseef

Address: Upon information and belief, the individual resides in the Kingdom of

Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.

Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993, the parent organization of the IIRO. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's presence in Pakistan and Afghanistan during the Soviet-Afghan war and their activities in support of the mujahideen fighters; and (iii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Naseef has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

5. Dr. Ahmed Muhammad Ali

Address: Unknown.

Subject: Dr. Ali served as the Secretary General of the MWL from approximately 1993-1995, and further served as a member of the IIRO's Board of Directors. Accordingly, Dr. Ali has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2004.

Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.

Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

7. Wa'el Hamza Jelaidan

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: According to Jelaidan's Curriculum Vitae, he was a Director for the MWL from approximately 1989-1994. The MWL is the parent organization of the IIRO. Jelaidan also ran the IIRO's branch office in Peshawar, Pakistan, and maintained close ties with the Director of the IIRO's branch office in the Philippines, Mohammed Jamal Khalifa. Jelaidan further served as the Secretary General of the Saudi Joint Relief Committee ("SJRC") which had a financial relationship with the IIRO in Albania and Kosovo. Jelaidan also has ties to the MWL and IIRO branch offices in Afghanistan, Albania, and Kosovo. Accordingly, Jelaidan has knowledge and information regarding the following: (i) the founding of al Qaeda, including the financial infrastructure created to support the terror group; (ii) al Qaeda's use of

purported charitable organizations, such as the MWL and IIRO, to financially and materially support Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) the MWL and IIRO's support for al Qaeda fighters and their training camps in Afghanistan, Pakistan, Kashmir, and other regions; and (iv) Jelaidan's use of the IIRO branch office in Peshawar, Pakistan to provide IIRO identification cards to al Qaeda fighters and other mujahideen to get them across the Afghan-Pakistan border, and to facilitate the purchase of weapons for al Qaeda.

8. Ibrahim Afandi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Afandi served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Afandi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc. Moreover, Afandi served on the board of the IIRO in Kosovo. Accordingly, Afandi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO in Kosovo; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Mustafa Muhammed Idris

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Idris served on the board of the IIRO in Kosovo. Accordingly, Idris has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO in Kosovo; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Muhammad bin Abdullah Taibah

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Taibah served as the President of the Al Haramain al Masjed al Aqsa, an Executive Order 13224 Specially Designated Global Terrorist ("SDGT") entity. Taibah further served as a member of the IIRO's Board of Directors, and on the IIRO's board in Kosovo. Accordingly, Taibah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO in Kosovo; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Prince Turki bin Jalawi al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Turki is the former head of the IIRO's Eastern Province branch office in the Kingdom of Saudi Arabia, and further served as an official of the Saudi Joint Relief Committee ("SJRC"), of which the IIRO is a member. Accordingly, Prince Turki has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
12. Abd al Hamid Sulaiman al Mujil
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mujil has worked for the IIRO for approximately 18+ years, serving 15+ of those years as the Executive Director of the IIRO Eastern Province branch office in the Kingdom of Saudi Arabia. In his capacity as the Executive Director, Mujil oversees and controls the operations of the Eastern Province branch which includes providing financial support to overseas IIRO branch offices such as those in the Philippines and Indonesia. On August 3, 2006, the U.S. Department of the Treasury designated Mujil pursuant to Executive Order 13224 for using his position with the IIRO to bankroll the al Qaeda network, to support Islamic militant groups, and to fundraise for terror organizations such as the Abu Sayyaf Group and Jemmah Islamiyah. Accordingly, Mujil has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
13. Suleiman Abdulaziz al Rajhi
Address: Upon information and belief, the individual can be contacted through the Al Rajhi Banking and Investment Corporation, Riyadh, Saudi Arabia or through the attorneys at Fish & Richardson, 1717 Main Street, Suite 5000, Dallas, Texas 75201.
Subject: Al Rajhi served as a member of the IIRO Executive Council. Accordingly, al Rajhi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
14. Dr. Salim Ahmed bin Mahfouz
Address: Unknown.
Subject: Bin Mahfouz served as Director of the IIRO's branch offices in Slovenia, Albania, and Austria. Bin Mahfouz also served as a member of the IIRO's Board of Directors. Accordingly, bin Mahfouz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

15. Ali Abdullah al Jerais
Address: Unknown.
Subject: Jerais served as Director of the IIRO's office in Riyadh, Saudi Arabia. Accordingly, Jerais has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
16. Zaher Abd al Aziz
Address: Unknown.
Subject: Aziz served as the Executive Director of the IIRO's branch offices in the Balkans. Accordingly, Aziz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
17. Husam Aabidin
Address: Unknown.
Subject: Aabidin served as the IIRO's Financial Affairs Supervisor for the Balkans. Accordingly, Aabidin has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
18. Dr. Ghazi Mahfouz Felemban
Address: Unknown.
Subject: Felemban served as the IIRO's Assistant Director General for Finance and Investment. Felemban also served as a member of the IIRO's Supreme Investment Committee. Accordingly, Felemban has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
19. Zidene Boukhalfa
Address: Unknown.
Subject: Boukhalfa served as the Executive Director of the IIRO's branch offices in the Balkans following the removal of Zaher Abd al Aziz. Accordingly, Boukhalfa has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
20. Muhammad Afdal Cheema
Address: Unknown.
Subject: Cheema served as Director of the IIRO's branch office in Pakistan from 1994-1998. Accordingly, Cheema has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations,

investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

21. **Mua'yad bin Abd al Wahid al Butairi**
Address: Unknown.
Subject: Butairi served as Director of the IIRO's branch office in Pakistan from 1998-2001. Accordingly, Butairi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. **Rahmatullah Nazir Khan Qari**
Address: Unknown.
Subject: Qari served as Director of the IIRO's branch office in Pakistan following Butairi's removal in 2001. Accordingly, Qari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

23. **Abdul Aziz Abdullah al Bashawari**
Address: Unknown.
Subject: Bashawari served as Head of the IIRO's Finances and Administrative Monitoring Administration. Accordingly, Qari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

24. **Hidar Sidat**
Address: Unknown.
Subject: Sidat was hired by the IIRO to audit the IIRO's branch office in Pakistan. Accordingly, Sidat has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

25. **Saleh bin Abdullah al Seikhan**
Address: Unknown.
Subject: Seikhan served as the IIRO's Financial Manager at its headquarters in Saudi Arabia. Accordingly, Seikhan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

26. **Bader a Din Abd al Wahab**
Address: Unknown.

Subject: Wahab served as the Director of the IIRO's branch office in Sarajevo. Accordingly, Wahab has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

27. Zakaria Muhammad al Sheikh

Address: Unknown.

Subject: Sheikh served as the IIRO's East Africa Regional Director and further served as the Director of the IIRO's branch offices in the Philippines and Tanzania. Accordingly, Sheikh has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

28. Abd al Hadi Daguit

Address: Unknown.

Subject: Daguit served as the Director of the IIRO's branch office in Manila, Philippines from 1996-1998, following Mohammed Jamal Khalifa, brother-in-law to Osama bin Laden and senior al Qaeda member. According to the U.S. government, Daguit was "a trusted associate of Khalifa." Accordingly, Daguit has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

29. Hamud al Laham

Address: Unknown.

Subject: Laham served as the Director of the IIRO's branch office in Manila, Philippines. Accordingly, Laham has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

30. Abdullah bin Ibrahim al Sahibani

Address: Unknown.

Subject: Sahibani served as the Director of the IIRO's branch office in Indonesia from 1997-2002. Accordingly, Sahibani has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

31. Fauzi bin Hassan bin Muhammad Jamal

Address: Unknown.

Subject: Jamal served as the Director of the IIRO's branch office in Indonesia from 2002-2004. Accordingly, Jamal has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations,

investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

32. Fahd bin Muhammad Sand al Harbi
Address: Unknown.
Subject: Harbi served as the Director of the IIRO's branch office in Indonesia beginning in 2004. Accordingly, Harbi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
33. Muhammad Banoun
Address: Unknown.
Subject: Banoun served as an employee of the IIRO's branch office in Indonesia. Accordingly, Banoun has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
34. Yusuf bin Salem al Ghanem
Address: Unknown.
Subject: Ghanem served as the Director of the IIRO's branch offices in Albania and Kosovo. Accordingly, Ghanem has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
35. Walid S.A. Hamed (a/k/a A/ Hammeed)
Address: Unknown.
Subject: Hamed served as the Director of the IIRO's branch office in Albania. Accordingly, Hamed has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
36. Nazia Ahmad Sandi
Address: Unknown.
Subject: Sandi served as the manager of the IIRO's branch offices in Albania and Kosovo. Accordingly, Sandi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
37. Saleh bin Ahmed al Dhibani
Address: Unknown.
Subject: Dhibani served as the Director of the IIRO's branch offices in Kosovo, and further served as the manager of the IIRO's branch office in Albania.

Accordingly, Dhibani has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

38. Sa'ed al Ubeidi
Address: Unknown.
Subject: Ubeidi served as the manager of the IIRO's branch office in Kosovo. Accordingly, Ubeidi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
39. Ahmad bin Naf'e al Harbi
Address: Unknown.
Subject: Harbi served as the Supervisor of the IIRO's branch offices in the Balkans. Accordingly, Harbi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
40. El Fatih Hassanein
Address: Unknown.
Subject: Hassanein served as the Director of the IIRO's branch office in Vienna. Accordingly, Hassanein has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
41. Sukarno Hassanein
Address: Unknown.
Subject: Hassanein served as the Deputy Director of the IIRO's branch office in Vienna. Accordingly, Hassanein has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
42. Fouad Mahafzah
Address: Unknown.
Subject: Mahafzah served as the Director of the IIRO's branch office in Tuzla. Accordingly, Mahafzah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
43. Tarek Ali Suleiman al Ali
Address: Unknown.

Subject: Ali served in the IIRO's Special Office for Monitoring and Governmental Affairs. Accordingly, Ali has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

44. Hassan Bahafzallah

Address: Unknown.

Subject: Bahafzallah served as a member of the IIRO's Supreme Investment Committee. Bahafzallah further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Bahafzallah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

45. Ahmad bin Abdallah al Qahtani

Address: Unknown.

Subject: Qahtani served as the Director of the IIRO's Offices Administration. Accordingly, Qahtani has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

46. Saud Nur Jastaniyah

Address: Unknown.

Subject: Jastaniyah served as the Director of the IIRO's Overseas Offices and Centers Administration. Accordingly, Jastaniyah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

47. Fouad bin Abdullah Akbar

Address: Unknown.

Subject: Akbar served as the Director of the IIRO's Emergency Relief Administration. Accordingly, Akbar has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

48. Dr. Ibrahim al Abdan

Address: Unknown.

Subject: Abdan served as the Director of the IIRO's Emergency Relief Administration. Accordingly, Abdan has knowledge and information regarding: (i)

the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

49. Dr. Awad bin Salama al Ruhaili

Address: Unknown.

Subject: Ruhaili served as the IIRO's Internal Auditor. Accordingly, Ruhaili has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

50. Ghazi bin Hassan Arafsha

Address: Unknown.

Subject: Arafsha served as the IIRO's Financing Director. Accordingly, Arafsha has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

51. Amir Jasim Muhammad

Address: Unknown.

Subject: Muhammad served as the Director of Finance for the IIRO's branch office in Pakistan. Accordingly, Muhammad has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

52. Ahmad Muhammad Musallam

Address: Unknown.

Subject: Musallam served as the Director of the IIRO's branch office in Kenya. Accordingly, Musallam has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

53. Mahmoud Hawsawi

Address: Unknown.

Subject: Hawsawi served as the Director of the IIRO's branch office in Kenya. Accordingly, Hawsawi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

54. Abd al Hamid Ja'far Daghestani

Address: Unknown.

Subject: Daghestani served as the Director of the IIRO's branch office in Moscow,

and further served as the IIRO's Regional Manager in Baku. Daghestani also supervised the IIRO's Northern Caucasus branch office in Makhachkala. Accordingly, Daghestani has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

55. Abu Talal al Qassimi

Address: Unknown.

Subject: Qassimi served as the Director of the IIRO's branch office in Peshawar, Pakistan. Accordingly, Qassimi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

56. Ibrahim al Zahar

Address: Unknown.

Subject: Zahar served as the Director of the IIRO's branch office in Peshawar, Pakistan. Accordingly, Zahar has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

57. Abd as Samd al Ansari

Address: Unknown.

Subject: Ansari served as the Director of the IIRO's branch office in Albania. Accordingly, Ansari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

58. Abd al Raouf al Sharman

Address: Unknown.

Subject: Sharman served as the Chairman of the Executive Committee of the IIRO's branch office in Bosnia-Herzegovina. Accordingly, Sharman has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

59. Saleh al Kazlan

Address: Unknown.

Subject: Kazlan served as the Director of the IIRO's branch office in Sudan. Accordingly, Kazlan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

60. Suleiman Ali al Ali
Address: Unknown.
Subject: Ali served as the Director of the IIRO's branch office in the United States and further served as a member of the IIRO's Executive Committee. Accordingly, Ali has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
61. Muhammad bin Abdullah al Dubayban
Address: Unknown.
Subject: Dubayban served as Board Member of Al Haramain al Masjid al Aqsa and further served as a member of the IIRO's Board of Directors. Accordingly, Dubayban has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
62. Uthman bin Abdul Kader Hafez
Address: Unknown.
Subject: Hafez served as the Chief Executive officer of Sanabel al Khair-Saudi Arabia. Accordingly, Hafez has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
63. Saleh Kamel
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Kamel served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Kamel has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
64. Khaled bin Hamed Zini
Address: Unknown.
Subject: Zini served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly,

Zini has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

65. Abdullah bin Salem bin Mahfuz

Address: Unknown.

Subject: Mahfuz served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mahfuz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

66. Talal bin Muhammad Badkuk

Address: Unknown.

Subject: Badkuk served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Badkuk has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

67. Mazen bin Muhammad Batterji

Address: Unknown.

Subject: Batterji served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Batterji has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

68. Dr. Abdullah bin Abd al Aziz al Muslah
Address: Unknown.
Subject: Dr. Muslah served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Muslah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
69. Dr. Yusuf bin Abdullah Bassudan
Address: Unknown.
Subject: Dr. Bassudan served as the IIRO's Deputy Secretary General for Financial and Administrative Affairs. Dr. Bassudan also served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Bassudan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
70. Sheikh Abd al Rahman Abd al Kader Faqih
Address: Unknown.
Subject: Sheikh Faqih served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Faqih has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
71. Ibrahim bin Muhammad al Jamih
Address: Unknown.
Subject: Jamih served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Jamih has knowledge and information regarding: (i) the operations, policies, and

activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

72. Ahmad Muthar

Address: Unknown.

Subject: Muthar served as legal counsel to the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Muthar has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

73. Sheikh Saleh al Zamal

Address: Unknown.

Subject: Sheikh Zamal served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Zamal has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

74. Sheikh Mari bin Mafuz

Address: Unknown.

Subject: Sheikh Mafuz served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Mafuz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

75. Sharif Mansur Abu Riyash

Address: Unknown.

Subject: Riyash served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia,

including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Riyash has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

76. Abd al Aziz Randora

Address: Unknown.

Subject: Randora served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Randora has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

77. Ali Bashawari

Address: Unknown.

Subject: Bashawari served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Bashawari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

78. Saleh Ahmad Ba-aboud

Address: Unknown.

Subject: Ba-aboud is the Director of the IIRO's branch offices located around the globe. Positioned at IIRO's headquarters in Saudi Arabia, Ba-aboud monitors and supervises the activities of the IIRO branch offices. Accordingly, Ba-aboud has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and its branch offices; (ii) the extensive reporting the branch offices are required to provide to the IIRO headquarters throughout the year; and (iii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

79. Dr. Ali bin Ibrahim al Namleh

Address: Unknown.

Subject: Dr. Namleh is the former Saudi Minister of Labor and Social Affairs and

served as the representative of King Fahd during various delegations to Kosovo. Dr. Namleh oversaw numerous charitable projects in Kosovo undertaken by many of the Saudi charities including the IIRO, Saudi Joint Relief Committee, Saudi Red Crescent, Al Haramain Islamic Foundation, and World Assembly of Muslim Youth. Accordingly, Dr. Namleh has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

80. Muhammad al Zawahiri

Address: Unknown.

Subject: Zawahiri was an employee of the IIRO's branch office in Albania from 1993 through at least 2000. Zawahiri is the younger brother of al Qaeda leader Ayman al Zawahiri. Muhammad al Zawahiri was in command of terrorist cells in Albania during the 1990s and was responsible for finding jobs for jihadists with Islamic charities, including the IIRO. Accordingly, Zawahiri has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

81. Jamal al Fadl

Address: Upon information and belief, the individual is currently in witness protection and can be contacted through the U.S. Department of Justice.

Subject: Al Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Al Fadl has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Al Fadl further has knowledge and information regarding the following: (i) the IIRO's direct support to members of al Qaeda by providing them with false identification thereby enabling them to cross the Pakistan-Afghanistan border for training at al Qaeda camps; (ii) Wa'el Hamza Jelaidan's employment with the IIRO and how Jelaidan used the IIRO office in Pakistan to facilitate the purchase of weapons for al Qaeda; and (iii) Mohammed Jamal Khalifa's employment with the IIRO and Khalifa's close relationship with Osama bin Laden.

82. Randall Todd Royer (a/k/a Ismail Royer)

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Royer is a former American mujahideen recruit who participated in the Bosnian jihad and has admitted to U.S. authorities that he aided and abetted a number of individuals in gaining entry to terrorist training camps in Pakistan for weapons and military training. Royer has further stated that the IIRO was well

known for its reputation as a front for jihad and for assisting mujahideen fighters get into Bosnia using IIRO identification cards. Accordingly, Royer has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

83. Enaam Arnaout

Address: Upon information and belief, the individual currently resides in Illinois.

Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 13224 Specially Designated Global Terrorist ("SDGT") entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding the IIRO's operations, policies, and activities, including the allegations, investigations, and facts concerning IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

84. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Office of Steven Barentzen, 1750 K Street, N.W., Suite 700, Washington, D.C. 20006.

Subject: In the years leading up to the September 11, 2001 terrorist attacks, Mirza served in various positions with the MWL's branch office in the United States – Director, Secretary, Treasurer, and Registered Agent. By virtue of his relationship with the MWL, Mirza has knowledge and information regarding the IIRO's activities in the United States and abroad, including but not limited to: (i) the allegations, investigations, and facts concerning the IIRO's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; and (ii) the allegations, investigations, and facts concerning the IIRO's assistance, financial or otherwise, to defendants Sana-Bell, Inc. and Sanabel al Kheer.

85. Gregory Brown

Address: Upon information and belief, the individual resides in the United States.

Subject: Brown is a former member of the Sanabel al Kheer, Inc.'s Board of Directors. Accordingly, Brown has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations,

investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

86. Dr. Abdel Moniem el Hillali
Address: Upon information and belief, the individual resides in the United States.
Subject: Dr. Hillali is a former member of the Sanabel al Kheer, Inc.'s Board of Directors. Accordingly, Dr. Hillali has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
87. Dr. Abdulrahamn al Saati
Address: Unknown.
Subject: Dr. Saati is an original member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, Dr. Saati has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
88. Abdel Mohamed Mujahri
Address: Unknown.
Subject: Mujahri is an IIRO representative in Kandahar, Afghanistan where he ran the Arab Children's School. Accordingly, Mujahri has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
89. Zacarias Moussaoui
Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.
Subject: Moussaoui was an important figure within al Qaeda who had direct access and interactions with Osama bin Laden, Khalid Sheikh Mohammad, and other al Qaeda leadership. Moussaoui spent extensive time in Afghanistan around the al Qaeda leadership and trained at al Qaeda camps in the years leading up to the September 11th attacks. Osama bin Laden personally selected Moussaoui to create a database of financial donors to al Qaeda, which included the IIRO. Accordingly, Moussaoui has knowledge and information regarding the IIRO's activities, including the allegations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
90. Stuart A. Levey
Address: Upon information and belief, the individual can be contacted through HSBC, 8 Canada Square, 42nd Floor, London, E14 5HQ, United Kingdom.
Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his

capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

91. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through Green River Hollow Consulting, 446 Overlook Drive, Hillsdale, NY 12529.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

92. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

93. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he

helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Szubin further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups." Mr. Szubin became Treasury's Under Secretary for Terrorism and Financial Intelligence in 2015.

94. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

95. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

96. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20036.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing

and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

97. Ambassador Philip C. Wilcox, Jr.

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Middle East Institute, 1761 N Street, N.W., Washington, D.C. 20036.

Subject: Ambassador Wilcox has a long history with the U.S. Department of State, including serving as Deputy Assistant Secretary of State for Intelligence and Research and as Ambassador at Large and Coordinator for Counter Terrorism. Ambassador Wilcox has knowledge and information regarding the following: (i) the operations, policies, and activities of the IIRO; (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; and (iii) the IIRO's relationship with, and employment of, Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).

98. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Mr. Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Mr. Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Mr. Fitzgerald has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Mr. Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

99. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Center for Security Studies (“CSS”), but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency’s Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency’s Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden’s fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities’ provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities’ sponsorship and funding of al Qaeda and militant training camps.

100. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

101. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W.,

Suite 1000, Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

102. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

103. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 1440 New York Avenue, N.W. Washington, D.C. 20005.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center (“NCTC”) on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter’s leadership, served as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC were responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the International Islamic Relief

Organization, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

104. Mark Rossini

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Rossini is a former FBI Special Agent who served as the FBI's liaison to the Central Intelligence Agency's Bin Laden Issue Station. Mr. Rossini has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

105. Samir Naji Al Hasan

Address: Upon information and belief, the individual resides in Oman.

Subject: Al Hasan traveled to Afghanistan from Yemen in 1999 or 2000, attended the training camp at al Farouq, and became an al Qaeda bodyguard in August 2001. Al Hasan told U.S. authorities that he was in Afghanistan as a relief worker for the IIRO and that he received the position from the head of the IIRO. According to the Department of Defense: "The International Islamic Relief Organization was identified as an Islamic humanitarian organization with headquarters in Mecca, Saudi Arabia, and is financed by Usama bin Laden." Al Hasan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

106. Tariq Mahmoud Ahmed al Sawah

Address: Upon information and belief, the individual resides in Bosnia-Herzegovina.

Subject: Al Sawah lived in Bosnia and Croatia where he worked as a relief worker for the IIRO. He chose to go to the Balkans region after watching videos depicting the atrocities committed by Serbs against Bosnians, and eventually joined the Bosnian Third Army, whose members were predominantly Arab Mujahedin fighters. Al Sawah was expelled from Bosnia in 2000 and traveled to Afghanistan where he attended the al Farouq training camp and further served as an advanced explosives trainer at the Tarnak Farm training camp. Further, he authored a 400 page manuscript containing bomb-making techniques and provided it to al Qaeda members. Al Sawah further met Ayman al Zawahiri in 2002 and also attended a banquet dinner with Osama bin Laden and a senior al Qaeda lieutenant. Moreover, al Sawah's design for a shoe bomb technically matched the design of the shoe bomb used by Richard Reid in his failed attempt to bring down American Airlines Flight 63. Al Sawah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts

concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

107. **Khalid Sheikh Mohammed**
Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.
Subject: Khalid Sheikh Mohammed ("KSM") is a former senior member of al Qaeda and the mastermind of the September 11 attacks. The IIRO allegedly provided KSM with IIRO identification/employment cards during the Bosnian war so that KSM could enter the region to conduct jihad. Accordingly, KSM has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
108. **International Islamic Relief Organization ("IIRO")**
Address: The IIRO is represented by Lewis Baach Kaufmann Middlemiss, PLLC, 1899 Pennsylvania Avenue, N.W., Suite 600, Washington, D.C. 20006.
Subject: Representative(s) designated by the IIRO to testify to matters to be described in plaintiffs' Notice of Rule 30(b)(6) Deposition.
109. **Federal Bureau of Investigation ("FBI")**
Address: The FBI is located at 935 Pennsylvania Avenue, N.W., Washington, D.C. 20535.
Subject: Representative(s) designated by the FBI to testify pursuant to Rule 30(b)(6), relevant to the claims against the IIRO.
110. **U.S. Department of the Treasury**
Address: The Treasury Department is located at 1500 Pennsylvania Avenue, N.W., Washington, D.C. 20220.
Subject: Representative(s) designated by the Treasury Department to testify pursuant to Rule 30(b)(6), relevant to the claims against the IIRO.
111. **U.S. Department of State**
Address: The State Department is located at 2201 C Street, N.W., Washington, D.C. 20520.
Subject: Representative(s) designated by the State Department to testify pursuant to Rule 30(b)(6), relevant to the claims against the IIRO.
112. **Central Intelligence Agency ("CIA")**
Address: The CIA is located at 1000 Colonial Farm Road, Langley, VA 22101.
Subject: Representative(s) designated by the CIA to testify pursuant to Rule 30(b)(6), relevant to the claims against the IIRO.
113. **U.S. Department of Defense ("DOD")**
Address: The DOD is located at The Pentagon, Washington, D.C. 22202.

Subject: Representative(s) designated by the DOD to testify pursuant to Rule 30(b)(6), relevant to the claims against the IIRO.

C. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the World Assembly of Muslim Youth (“WAMY”). Individuals include, but are not limited to:

1. Dr. Saleh al Wohaibi
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at the Law Firm of Omar T. Mohammedi, LLC, Woolworth Building, 233 Broadway, Suite 820, New York, NY 10279.
Subject: Dr. Wohaibi currently serves as the Secretary General for the World Assembly of Muslim Youth (“WAMY”). In his capacity as Secretary-General, al Wohaibi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
2. Dr. Abdullah bin Abdul Mohsen al Turki
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.
Subject: Dr. Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. Turki’s authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities’ provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, particularly as they relate to WAMY.
3. Prince Turki bin Jalawi al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Turki served as official of the Saudi Joint Relief Committee (“SJRC”), of which WAMY is a member. In his capacity as an official of the SJRC, Prince Turki has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
4. Prince Bandar bin Sultan al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Bandar served as the Kingdom of Saudi Arabia’s Ambassador to

the United States from 1983-2005. During that time, Prince Bandar played an important role in the establishment and funding of WAMY's branch office in the United States. Accordingly, Prince Bandar has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

5. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2004.
Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.
Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of the WAMY; and (ii) the allegations, investigations and facts concerning the WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
6. Dr. Abdul Wahab A. Noorwali
Address: Unknown.
Subject: Dr. Noorwali served as WAMY's Assistant Secretary-General. Accordingly, Dr. Noorwali has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
7. Dr. Ibrahim bin Hamad al Quayid
Address: Unknown.
Subject: Dr. Quayid served as WAMY's Assistant Secretary-General for Executive Affairs, and further served as WAMY's Assistant Secretary-General for Planning and Supervision Affairs. Accordingly, Dr. Quayid has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
8. Dr. Abdul Rahman Abdul Aziz al Rabee'ah
Address: Unknown.
Subject: Dr. Rabee'ah served as WAMY's Assistant Secretary-General for WAMY's Eastern Province branch. Accordingly, Dr. Rabee'ah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
9. Dr. Hamid bin Kalil al Shaiji
Address: Unknown.

Subject: Dr. Shaiji served as WAMY's Assistant Secretary-General for Planning and Supervision Affairs. Accordingly, Dr. Shaiji has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Dr. Sa'ed al Hamidi

Address: Unknown.

Subject: Dr. Hamidi served as WAMY's Assistant Secretary-General for WAMY's Southern Province branch. Accordingly, Dr. Hamidi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Dr. Saleh bin Abd al Aziz al Sheikh

Address: Unknown.

Subject: Dr. Sheikh served as WAMY's President and the Kingdom of Saudi Arabia's Minister of Islamic Affairs. Accordingly, Dr. Sheikh has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

12. Khalid Ibrahim al Sowailem

Address: Unknown.

Subject: Sowailem was employed by the Ministry of Islamic Affairs in the Royal Embassy of Saudi Arabia in Washington, D.C. as the Head of Da'awa for the United States. In that role, Sowailem had contact and coordination with WAMY's branch office in the United States. Accordingly, Sowailem has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, affiliated terrorist organizations, and the September 11th plot.

13. Dr. Saleh bin Ibrahim Babaeer

Address: Unknown.

Subject: Dr. Babaeer served as WAMY's Assistant Secretary-General for Overseas Offices. Accordingly, Dr. Babaeer has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

14. Mohammed al Khatib

Address: Unknown.

Subject: Khatib served as the Director of WAMY's branch office in Canada from

1998-2001. Accordingly, Khatib has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

15. Talhah al Jarad

Address: Unknown.

Subject: Jarad served as the Director of WAMY's branch office in Canada from 2001-2004. Accordingly, Jarad has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Ayman al Taher

Address: Unknown.

Subject: Taher served as the Director of WAMY's branch office in Canada from 2004 through the present. Accordingly, Taher has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

17. Ibrahim Malabari

Address: Unknown.

Subject: Malabari served as a representative of WAMY's branch office in Canada. Accordingly, Malabari has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

18. Alaa el Sayed

Address: Unknown.

Subject: Sayed served as a representative of WAMY's branch office in Canada. Accordingly, Sayed has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

19. Cathy Hawara

Address: Upon information and belief, the individual resides in Canada.

Subject: Ms. Hawara serves as the Director-General of the Canadian Revenue Agency ("CRA"), the branch of the Canadian government responsible for conducting an extensive investigation and audit of WAMY's branch office in Canada. The investigation conducted by the CRA uncovered evidence that the WAMY branch office shared common officers, office space, contact information, and bank accounts with Executive Order 13224 Specially Designated Global Terrorist ("SDGT") entity Benevolence International Fund-Canada ("BIF-

Canada”). In addition, the CRA’s investigation discovered that the WAMY branch office was funding Executive Order 13224 SDGT entity Benevolence International Foundation (“BIF”) in the United States. In her capacity as Director-General of the CRA, Ms. Hawara has knowledge and information regarding the Canadian government’s investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. Ibrahim Sulayman Abdullah

Address: Unknown.

Subject: Abdullah served the Deputy Director of WAMY’s branch office in the United States from 1999-2004, and further served as a member of WAMY’s Board of Trustees. Accordingly, Abdullah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

21. Abdullah Awad bin Laden

Address: Unknown.

Subject: Bin Laden founded WAMY’s branch office in the United States and served as its President from 1992-2001. Bin Laden further served as a member of WAMY’s Board of Trustees. Accordingly, bin Laden has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. Mohammed Moustafa Mohammed

Address: Unknown.

Subject: Mohammed served as the Director General for WAMY’s office in Pakistan from 1990-2002. Accordingly, Mohammed has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

23. Ibrahim Anwar Ibrahim

Address: Unknown.

Subject: Ibrahim served as the Deputy Office Manager for WAMY’s office in Pakistan. Accordingly, Ibrahim has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

24. Hassan bin Abdah Kadish

Address: Unknown.

Subject: Kadish served as the head of WAMY’s Office of Administration. Accordingly, Kadish has knowledge and information regarding: (i) the operations,

policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

25. Said Rageah

Address: Upon information and belief, the individual resides in Scarborough, Canada.

Subject: Rageah was employed by WAMY in the United States prior to the September 11, 2001 attacks. Accordingly, Rageah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

26. Fahad al Awadi

Address: Unknown.

Subject: Awadi served as the head of WAMY's branch office in London, United Kingdom. Accordingly, Awadi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

27. Sheikh Abdul al Majid bin Aziz al Zindani

Address: Unknown.

Subject: Sheikh Zindani is the founder and head of the Al Imam University in Yemen and worked closely with WAMY Secretary-General Dr. Manih ibn Hammad al Juhani and other WAMY officials. Zindani was designated as a Specially Designated Global Terrorist ("SDGT") by the U.S. Treasury Department on February 24, 2004. According to the U.S. government: "Abd Al Majid Zandani was an active supporter of Usama Bin Laden. Zandani was involved in raising funds and recruiting volunteers for the Bin Laden organization. Zandani is also a religious and legal expert for Usama Bin Laden." Accordingly, Zindani has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

28. Enaam Arnaout

Address: Upon information and belief, the individual currently resides in Illinois.

Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 13224 Specially Designated Global Terrorist ("SDGT") entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror

organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding WAMY's operations, policies, and activities, including the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

29. Uwaysh bin Harbi al Ghamedi

Address: Unknown.

Subject: Ghamedi served as WAMY's Assistant Secretary-General in Jeddah and further served on WAMY's committee to oversee the operations of Lajnat al Birr al Islamiya, the precursor to the Benevolence International Foundation ("BIF"). Accordingly, Ghamedi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

30. Adel Abdul Jalil Ibrahim Batterjee

Address: Unknown.

Subject: Batterjee is a former WAMY officer and founder of Lajnat al Birr al Islamiya, the precursor to the Benevolence International Foundation ("BIF"). Accordingly, Batterjee has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

31. Ibrahim Faruq al Zayyat

Address: Unknown.

Subject: Zayyat served as the manager of WAMY's branch office in Western Europe. Accordingly, Zayyat has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

32. El Fatih Hassanein

Address: Unknown.

Subject: Hassanein served as the Director of WAMY's branch office in Vienna, Austria. Accordingly, Hassanein has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

33. Mahmoud Ghazal

Address: Unknown.

Subject: Ghazal served as the head of WAMY's Palestine Youth Committee.

Accordingly, Ghazal has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

34. Fareed Yaqoob

Address: Unknown.

Subject: Yaaqoob served as the Comptroller of WAMY's office in Riyadh, Saudi Arabia. Accordingly, Yaqoob has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

35. Dr. Suleiman bin Nasser Basahal

Address: Unknown.

Subject: Dr. Basahal served as WAMY's Deputy Secretary General and a member of WAMY's Board of Trustees. Accordingly, Dr. Basahal has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

36. Dr. Abu Bakr Ba Qadir

Address: Unknown.

Subject: Dr. Qadir served as a member of WAMY's Board of Trustees. Accordingly, Dr. Qadir has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

37. Dr. Ahmad Muhammad Totonji

Address: Unknown.

Subject: Dr. Totonji served as a member of WAMY's Board of Trustees. Accordingly, Dr. Totonji has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

38. Dr. Jamal al Barzinji

Address: Unknown.

Subject: Dr. Barzinji served as a member of WAMY's Board of Trustees. Accordingly, Dr. Barzinji has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

39. Dr. Abdullah Omar Naseef
Address: Unknown.
Subject: Dr. Naseef served as a member of WAMY's Board of Trustees. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
40. Dr. Muhammad bin Ahmad al Faraj
Address: Unknown.
Subject: Dr. Faraj served as a member of WAMY's Board of Trustees. Accordingly, Dr. Faraj has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
41. Dr. Khaled bin Abd Al-Rahman al Ajimi
Address: Unknown.
Subject: Dr. Ajimi served as a member of WAMY's Board of Trustees. Accordingly, Dr. Ajimi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
42. Dr. Saleh bin Ibrahim al Sanie
Address: Unknown.
Subject: Dr. Sanie served as a member of WAMY's Board of Trustees. Accordingly, Dr. Sanie has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
43. Dr. Abdul Rahman bin Hadi al Shamrani
Address: Unknown.
Subject: Dr. Shamrani served as a member of WAMY's Board of Trustees. Accordingly, Dr. Shamrani has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
44. Dr. Saleh bin Omar Badahadah
Address: Unknown.
Subject: Dr. Badahadah served as a member of WAMY's Board of Trustees. Accordingly, Dr. Badahadah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

45. Dr. Abdullah Sayyed Taher
Address: Unknown.
Subject: Dr. Taher served as a member of WAMY's Board of Trustees and WAMY's representative in South Asia; New Delhi, India. Accordingly, Dr. Taher has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
46. Dr. Muhammad Abd al Rahman Sparla
Address: Unknown.
Subject: Dr. Sparla served as a member of WAMY's Board of Trustees and WAMY's representative in South America. Accordingly, Dr. Sparla has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
47. Dr. Sayyedi Ghali Lu
Address: Unknown.
Subject: Dr. Lu served as a member of WAMY's Board of Trustees and WAMY's representative in West Africa; Senegal. Accordingly, Dr. Lu has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
48. Ibrahim Milazi
Address: Unknown.
Subject: Milazi served as a member of WAMY's Board of Trustees and WAMY's representative in Southern Africa; Malawi. Accordingly, Milazi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
49. Dr. Salem Badmaneh
Address: Unknown.
Subject: Dr. Badmaneh served as a member of WAMY's Board of Trustees and WAMY's representative in Eastern Africa; Nairobi, Kenya. Accordingly, Dr. Badmaneh has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
50. Abd al Rahim Rasheed
Address: Unknown.

Subject: Rasheed served as a member of WAMY's Board of Trustees and WAMY's representative in the Pacific Region; Canberra, Australia. Accordingly, Rasheed has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

51. Hussein Muhdhar

Address: Unknown.

Subject: Muhdhar served as a member of WAMY's Board of Trustees and WAMY's representative in Western Europe. Accordingly, Muhdhar has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

52. Dr. Hamad bin Ibrahim al Sulayfih

Address: Unknown.

Subject: Dr. Sulayfih served as a member of WAMY's General Secretariat Council. Accordingly, Dr. Sulayfih has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

53. Dr. Muhammad bin Umar Jamjum

Address: Unknown.

Subject: Dr. Jamjum served as a member of WAMY's General Secretariat Council. Accordingly, Dr. Jamjum has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

54. Dr. Ahmad bin Uthman al Tuwayjiri

Address: Unknown.

Subject: Dr. Tuwayjiri served as a member of WAMY's General Secretariat Council. Accordingly, Dr. Tuwayjiri has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

55. Dr. Muhammad bin Majed al Farraj

Address: Unknown.

Subject: Dr. Farraj served as a member of WAMY's General Secretariat Council. Accordingly, Dr. Farraj has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

56. Dr. Anwar Hajjaj
Address: Unknown.
Subject: Dr. Hajjaj served as a member of WAMY's General Secretariat Council and an officer of WAMY's branch office in the United States. Accordingly, Dr. Hajjaj has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
57. Ahmad Jalbat
Address: Unknown.
Subject: Jalbat served as the Director of WAMY's Da'awa Programs. Accordingly, Jalbat has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
58. Muhammad Rifat Musa
Address: Unknown.
Subject: Musa served as WAMY's Financial Manager. Accordingly, Musa has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
59. Dr. Jahid Maksoud Tarim
Address: Unknown.
Subject: Dr. Tarim served as WAMY's Supervisor General for the Care of Orphans. Accordingly, Dr. Tarim has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
60. Muhammad Balqalal
Address: Unknown.
Subject: Balqalal served as WAMY's Director for the Care of Orphans. Accordingly, Balqalal has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
61. Dr. Mohammed Saleh Ibrahim Abu el Ela
Address: Unknown.
Subject: Dr. Ela served as WAMY's Deputy Assistant Secretary General and the General Supervisor of the Department of Religious Endowments. Accordingly, Dr. Ela has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning

WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

62. Dr. Abdullah Abdel Kareem Saleh
Address: Unknown.
Subject: Dr. Saleh served as the head of WAMY's Overseas Offices Department. Accordingly, Dr. Saleh has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
63. Dr. Hamdi al Morsi
Address: Unknown.
Subject: Dr. Morsi served as the Director of WAMY's Foreign Affairs Department. Accordingly, Dr. Morsi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
64. Dr. Aadel Saleh Feeda
Address: Unknown.
Subject: Dr. Feeda served as the General Supervisor of WAMY's Programs and Projects Department. Accordingly, Dr. Feeda has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
65. Abdul Majid Farah
Address: Unknown.
Subject: Farah served as WAMY's Chief Financial Officer. Accordingly, Farah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
66. Muhammad al Hamood
Address: Unknown.
Subject: Hamood served as the head of WAMY's branch office in Russia. Accordingly, Hamood has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
67. Dr. Khaled Yousef al Biejan
Address: Unknown.
Subject: Dr. Biejan served as Deputy General Supervisor for WAMY's Eastern

Province branch. Accordingly, Dr. Biejan has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

68. Dr. Jamal al Din bin Yousef Siaghur
Address: Unknown.
Subject: Dr. Siaghur served as Human Resources Manager for WAMY's Eastern Province branch. Accordingly, Dr. Siaghur has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
69. Dr. Abdullah Abu Sayyef al Johani
Address: Unknown.
Subject: Dr. Johani served as the General Supervisor for WAMY's branch office in Medina. Accordingly, Dr. Johani has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
70. Abdul Karim Osman Wadden
Address: Unknown.
Subject: Wadden served as the Director General of WAMY's branch office in Jeddah. Accordingly, Wadden has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
71. Dr. Muhammad Balkharshush
Address: Unknown.
Subject: Dr. Balkharshush served as the manager of WAMY's branch office in Western Europe. Accordingly, Dr. Balkharshush has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
72. Dr. Fadel Fouad Suleiman
Address: Unknown.
Subject: Dr. Suleiman served as an officer in WAMY's branch office in the United States. Accordingly, Dr. Suleiman has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

73. Aaraf Abdullah Abd al Hamid
Address: Unknown.
Subject: Hamid served as the manager of WAMY's branch office in Azerbaijan. Accordingly, Hamid has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
74. Omar Muhammad Naji
Address: Unknown.
Subject: Naji served as the manager of WAMY's branch office in Yemen. Accordingly, Naji has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
75. Dr. Muhammad Nour
Address: Unknown.
Subject: Nour served as the manager of WAMY's branch office in Indonesia. Accordingly, Nour has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
76. Aman Allah Jan
Address: Unknown.
Subject: Jan served as a representative of WAMY's branch office in Pakistan. Accordingly, Jan has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
77. Ma'amur Hassan al Din
Address: Unknown.
Subject: Din served as the manager of WAMY's branch office in Jakarta. Accordingly, Din has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
78. Muhammad bins Zid al Halal
Address: Unknown.
Subject: Halal served as the manager of WAMY's branch office in Bangladesh. Accordingly, Halal has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

79. Muhammad Aasef Ya'qub
Address: Unknown.
Subject: Ya'qub served as the manager of WAMY's branch office in Kashmir. Accordingly, Ya'qub has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
80. Abd al Rashid Ahmad Walla
Address: Unknown.
Subject: Walla served as the manager of WAMY's branch office in Thailand. Accordingly, Walla has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
81. Omar Idris Salleh
Address: Unknown.
Subject: Salleh served as the manager of WAMY's branch office in Sri Lanka. Accordingly, Salleh has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
82. Harin Aul al Din
Address: Unknown.
Subject: Din served as the manager of WAMY's branch office in Malaysia. Accordingly, Din has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
83. Dr. Shamim Abd al Hakim Khan
Address: Unknown.
Subject: Khan served as the manager of WAMY's branch office in Nepal. Accordingly, Khan has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
84. Muhammad Saleh
Address: Unknown.
Subject: Saleh served as the manager of WAMY's branch office in Kenya. Accordingly, Saleh has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

85. Abdullah Sadiq Makey
Address: Unknown.
Subject: Makey served as the manager of WAMY's branch office in Sudan. Accordingly, Makey has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
86. Abd al Qadder Muhammad Kattab
Address: Unknown.
Subject: Kattab served as the manager of WAMY's branch office in Somalia. Accordingly, Kattab has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
87. Yussef Ali Babakr
Address: Unknown.
Subject: Babakr served as the manager of WAMY's branch office in Chad. Accordingly, Babakr has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
88. Fathi Awuis Id
Address: Unknown.
Subject: Id served as the manager of WAMY's branch office in Mali. Accordingly, Id has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
89. Dr. Hamdi al Marsi al Sid
Address: Unknown.
Subject: Sid served as the manager of WAMY's branch office in Egypt. Accordingly, Sid has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
90. Hector Sha'aban Salleh
Address: Unknown.
Subject: Salleh served as the manager of WAMY's branch office in Albania. Accordingly, Salleh has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

91. Ibrahim Hader
Address: Unknown.
Subject: Hader served as the manager of WAMY's branch office in Bosnia-Herzegovina. Accordingly, Hader has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
92. Wagadi Ahmaduf
Address: Unknown.
Subject: Ahmaduf served as the manager of WAMY's branch office in Bulgaria. Accordingly, Ahmaduf has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
93. Ali al Ammudi
Address: Unknown.
Subject: Ammudi served as WAMY's representative in Central Asia; New Delhi, India. Accordingly, Ammudi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
94. Mustapha al Amry
Address: Unknown.
Subject: Amry served as WAMY's representative in in the Pacific Region; Canberra, Australia. Accordingly, Amry has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
95. Ali al Abduni
Address: Unknown.
Subject: Abduni served as WAMY's representative in Latin America. Accordingly, Abduni has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
96. Muhammad Searia
Address: Unknown.
Subject: Searia served as WAMY's representative in South America; Argentina. Accordingly, Searia has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

97. Muhammad bin Salem al Hamud
Address: Unknown.
Subject: Hamud served as the head of WAMY's Islamic Republics Youth Committee. Accordingly, Hamud has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
98. Saleh bin Sa'ed al Ansari
Address: Unknown.
Subject: Ansari served as the head of WAMY's Islamic Medical Committee. Accordingly, Ansari has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
99. Dr. Ibrahim bin Muhammad bin Yusef al Faiz
Address: Unknown.
Subject: Dr. Faiz served as the head of WAMY's Kashmir Youth Committee. Accordingly, Dr. Faiz has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
100. Zayid bin Ibrahim al Hamidi
Address: Unknown.
Subject: Hamidi served as a member of WAMY's Kashmir Youth Committee. Accordingly, Hamidi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
101. Dr. Abd al Hamid al Mazru
Address: Unknown.
Subject: Dr. Mazru served as the Chairman of WAMY's Kashmir Youth Committee. Accordingly, Dr. Mazru has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
102. Dr. Abd al Hamid al Zayd
Address: Unknown.
Subject: Dr. Zayd served as the head of WAMY's Two Americas Committee. Accordingly, Dr. Zayd has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

103. Muhammad al Qataby
Address: Unknown.
Subject: Qataby served as a member of WAMY's Activity Committee. Accordingly, Qataby has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
104. Mu'taz Abu Unq
Address: Unknown.
Subject: Unq served as the Executive Director of WAMY's Islamic Projects Committee. Accordingly, Unq has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
105. Dr. Ahmad Rasheed al Hameedy
Address: Unknown.
Subject: Dr. Hameedy served as the President of WAMY's Youth Committee in Asia. Accordingly, Dr. Hameedy has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
106. Muhammad bin Ali al Qaatabi
Address: Unknown.
Subject: Qaatabi served as the Chairman of WAMY's Internet Committee. Accordingly, Qaatabi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
107. Abdel Qadir Adam
Address: Unknown.
Subject: Adam served as the Finance Director of WAMY's branch office in Pakistan. Accordingly, Adam has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
108. Ahmed Bahafzallah
Address: Unknown.
Subject: Bahafzallah served as an officer of Lajnat al Birr al Islamiya in Pakistan. Accordingly, Bahafzallah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

109. Hassan Bahafzallah
Address: Unknown.
Subject: Bahafzallah served as a Director of Lajnat al Birr al Islamiya in Pakistan. Accordingly, Bahafzallah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
110. Adel Hassan Hamed
Address: Upon information and belief, the individual resides in Sudan.
Subject: Hamed was employed by Lajnat al Birr al Islamiya, the precursor to the Benevolence International Foundation ("BIF"), in Afghanistan and Pakistan from 1986-1999. When Hamed was laid off from Lajnat al Birr al Islamiya in 1999, he was hired as the Director of the WAMY hospital in Afghanistan. Hamed was detained on the basis of his association with al Qaeda and WAMY. According to the U.S. Government: "WAMY is a non-government organization operating in Afghanistan that may be affiliated with Usama Bin Ladin and al Qaeda operations. According to top WAMY officials, both the United States and Israel must be destroyed. WAMY provided financial support to the Palestinians fighting against Israel. In addition, WAMY has put forward a proposal that the Palestinians should declare open war on Israel." Hamed has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
111. Zacarias Moussaoui
Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.
Subject: Moussaoui was an important figure within al Qaeda who had direct access and interactions with Osama bin Laden, Khalid Sheikh Mohammad, and other al Qaeda leadership. Moussaoui spent extensive time in Afghanistan around the al Qaeda leadership and trained at al Qaeda camps in the years leading up to the September 11th attacks. Osama bin Laden personally selected Moussaoui to create a database of financial donors to al Qaeda, which included WAMY. Accordingly, Moussaoui has knowledge and information regarding WAMY's activities, including the allegations and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
112. Stuart A. Levey
Address: Upon information and belief, the individual can be contacted through HSBC, 8 Canada Square, 42nd Floor, London, E14 5HQ, United Kingdom.
Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

113. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

114. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through Green River Hollow Consulting, 446 Overlook Drive, Hillsdale, NY 12529.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

115. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

116. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he

helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Szubin became Treasury's Under Secretary for Terrorism and Financial Intelligence in 2015.

117. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

118. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1800 K Street, N.W., Washington, D.C. 20036.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

119. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Mr. Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Mr. Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Mr. Fitzgerald has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities,

Mr. Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

120. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Center for Security Studies ("CSS"), but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

121. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal

Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

122. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Suite 1000, Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

123. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

124. Michael E. Leiter
Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 1440 New York Avenue, N.W. Washington, D.C. 20005.
Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center (“NCTC”) on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter’s leadership, served as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC were responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the World Assembly of Muslim Youth, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
125. Mark Rossini
Address: Upon information and belief, the individual resides in the United States.
Subject: Mr. Rossini is a former FBI Special Agent who served as the FBI’s liaison to the Central Intelligence Agency’s Bin Laden Issue Station. Mr. Rossini has knowledge and information regarding the United States government’s investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
126. World Assembly of Muslim Youth (“WAMY”)
Address: WAMY is represented by the Law Firm of Omar T. Mohammedi, LLC, 233 Broadway, Suite 820, Woolworth Building, New York, NY 10279.
Subject: Representative(s) designated by WAMY to testify to matters to be described in plaintiffs’ Notice of Rule 30(b)(6) Deposition.
127. Federal Bureau of Investigation (“FBI”)
Address: The FBI is located at 935 Pennsylvania Avenue, N.W., Washington, D.C. 20535.
Subject: Representative(s) designated by the FBI to testify pursuant to Rule 30(b)(6), relevant to the claims against WAMY.
128. U.S. Department of the Treasury
Address: The Treasury Department is located at 1500 Pennsylvania Avenue, N.W., Washington, D.C. 20220.
Subject: Representative(s) designated by the Treasury Department to testify pursuant to Rule 30(b)(6), relevant to the claims against WAMY.

129. U.S. Department of State
Address: The State Department is located at 2201 C Street, N.W., Washington, D.C. 20520.
Subject: Representative(s) designated by the State Department to testify pursuant to Rule 30(b)(6), relevant to the claims against WAMY.
130. Central Intelligence Agency (“CIA”)
Address: The CIA is located at 1000 Colonial Farm Road, Langley, VA 22101.
Subject: Representative(s) designated by the CIA to testify pursuant to Rule 30(b)(6), relevant to the claims against WAMY.
131. U.S. Department of Defense (“DOD”)
Address: The DOD is located at The Pentagon, Washington, D.C. 22202.
Subject: Representative(s) designated by the DOD to testify pursuant to Rule 30(b)(6), relevant to the claims against WAMY.

D. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of Wa’el Hamza Jelaidan. Individuals include, but are not limited to:

1. Wa’el Hamza Jelaidan
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.
Subject: Jelaidan, a co-founder of al Qaeda and an Executive Order 13224 Specially Designated Global Terrorist (“SDGT”), served as a Director for the MWL from approximately 1989-1994. The MWL is the parent organization of the IIRO. Jelaidan also ran the IIRO’s branch office in Peshawar, Pakistan, and maintained close ties with the Director of the IIRO’s branch office in the Philippines, Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups). Jelaidan further served as the Secretary General of the Saudi Joint Relief Committee (“SJRC”) which had a financial relationship with the IIRO in Albania and Kosovo. Jelaidan also has ties to the MWL and IIRO branch offices in Afghanistan, Albania, and Kosovo. Accordingly, Jelaidan has knowledge and information regarding the following: (i) the founding of al Qaeda, including the financial infrastructure created to support the terror group; (ii) al Qaeda’s use of purported charitable organizations, such as the MWL and IIRO, to financially and materially support Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) the MWL and IIRO’s support for al Qaeda fighters and their training camps in Afghanistan, Pakistan, Kashmir, and other regions; and (iv) Jelaidan’s use of the IIRO branch office in Peshawar, Pakistan to provide IIRO identification cards to al Qaeda fighters and other mujahideen to get them across the Afghan-Pakistan border, and to facilitate the purchase of weapons for al Qaeda. Jelaidan also served as the Secretary General of the Rabita Trust, and was further appointed to Rabita Trust’s Board of Trustees. The Rabita Trust is an Executive Order 13224 Specially Designated Global Terrorist (“SDGT”) entity. Accordingly, Jelaidan has knowledge and information regarding: (i) the operations, policies, and

activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

2. Dr. Abdullah bin Abdul Mohsen al Turki
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.
Subject: In 1993, Dr. Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd. In that role, Dr. Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. Those charities under Dr. Turki's authority included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. Turki has knowledge and information regarding: (i) the MWL, IIRO and Rabita Trust's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

3. Dr. Abdullah bin Saleh al Obaid
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.
Subject: Dr. Obaid served as a member of Rabita Trust's Board of Trustees. Accordingly, Dr. Obaid has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) Rabita Trust's relationship with, and employment of, Jelaidan; and (iv) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

4. Dr. Adnan Khalil Basha
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.
Subject: Dr. Basha served as a member of Rabita Trust's Board of Trustees. Accordingly, Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) Rabita Trust's relationship with, and employment of, Jelaidan; and (iv) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

5. Dr. Abdullah Omar Naseef
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Kabat, PLLC, 1400 16th Street, N.W., Suite 500, Washington, D.C. 20036.
Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993, the parent organization of the IIRO. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the MWL and IIRO's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Prince Turki bin Jalawi al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Turki served as an official of the Saudi Joint Relief Committee ("SJRC"). Jelaidan served as a Director of the SJRC and used the organization as a front to move money and men to and from the Balkans on behalf of Osama bin Laden. Accordingly, Prince Turki has knowledge and information regarding: (i) the SJRC's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

7. Prince Talal bin Abdulaziz al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Talal served as a member of the Board of Directors of Rabita Trust. Accordingly, Prince Talal has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) Rabita Trust's relationship with, and employment of, Jelaidan; and (iv) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2004.
Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.
Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of the MWL, IIRO, and Rabita Trust; (ii) the allegations, investigations and facts concerning the MWL, IIRO, and Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) the MWL, IIRO, and Rabita Trust's relationship with, and employment of, Jelaidan; and (iv) the allegations, investigations, and facts

concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Abdul Rahman al Swailem
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Swailem served as the Chairman of the Saudi Joint Relief Committee ("SJRC") and was responsible for appointing Jelaidan as a Director of the SJRC. Jelaidan used the SJRC as a front to move money and men to and from the Balkans on behalf of Osama bin Laden. Accordingly, Swailem has knowledge and information regarding: (i) the SJRC's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Dr. Saleh al Wohaibi
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at the Law Firm of Omar T. Mohammedi, LLC, Woolworth Building, 233 Broadway, Suite 820, New York, NY 10279.
Subject: Dr. Wohaibi currently serves as the Secretary General for the World Assembly of Muslim Youth ("WAMY"). Dr. Wohaibi further served as an official of the Saudi Joint Relief Committee ("SJRC"). Jelaidan served as a Director of the SJRC and used the organization as a front to move money and men to and from the Balkans on behalf of Osama bin Laden. Accordingly, Dr. Wohaibi has knowledge and information regarding: (i) the SJRC's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Yassin Kadi
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through his attorneys at Salerno & Rothstein, 221 Schultz Hill Road, Pine Plains, NY 12567.
Subject: Kadi was designated as a Specially Designated Global Terrorist ("SDGT") by the U.S. Treasury Department on October 12, 2001. According to the U.S. government, Kadi "has funded terrorist and extremist individuals and operations." Kadi had an extensive personal, commercial, and charitable relationship with Jelaidan spanning several decades. Accordingly, Kadi has knowledge and information regarding the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

12. Chafiq Ayadi
Address: Unknown.
Subject: Ayadi worked with Jelaidan on several corporate entities. Ayadi was designated as a Specially Designated Global Terrorist ("SDGT") by the U.S.

Treasury Department on October 12, 2001. Accordingly, Ayadi has knowledge and information regarding the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

13. Mamdouh Mahmud Salim

Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.

Subject: Salim is a founding member of al Qaeda responsible for managing terrorist training camps in Afghanistan and Pakistan and undertaking efforts to obtain nuclear weapons for al Qaeda. Salim was arrested by German authorities on September 16, 1998 for his role in the 1998 Embassy bombings. Salim handled much of al Qaeda's international business activities, including corporate activities with Jelaidan. Accordingly, Salim has knowledge and information regarding the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

14. Jamal al Fadl

Address: Upon information and belief, the individual is currently in witness protection and can be contacted through the U.S. Department of Justice.

Subject: Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Fadl has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) Jelaidan's employment with the IIRO; and (iv) allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including Fadl's claim that Jelaidan used the IIRO office in Pakistan to facilitate the purchase of weapons for al Qaeda.

15. Amir Jasim Muhammad

Address: Unknown.

Subject: Muhammad served as the Director of Finance for the IIRO's branch office in Pakistan. Accordingly, Muhammad has knowledge and information regarding: (i) IIRO's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Muhammad Afdal Shima

Address: Unknown.

Subject: Shima served as Director of the IIRO's branch office in Pakistan. Accordingly, Shima has knowledge and information regarding: (i) IIRO's relationship with, and employment of, Jelaidan; and (ii) the allegations,

investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

17. **Mua'yad bin Abd al Wahid al Butairi**
Address: Unknown.
Subject: Butairi served as the Director of the IIRO's branch office in Pakistan and further served as a Project Director for Rabita Trust. Accordingly, Butairi has knowledge and information regarding: (i) IIRO's relationship with, and employment of, Jelaidan; (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) the operations, policies, and activities of Rabita Trust; and (iv) the allegations, investigations and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

18. **Ahmed Khalifa**
Address: Unknown.
Subject: Khalifa served as member of the joint MWL/IIRO envoy to Afghanistan in 2000 at the direction of Jelaidan. Accordingly, Khalifa has knowledge and information regarding: (i) IIRO's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

19. **Basit Madani**
Address: Unknown.
Subject: Madani served as member of the joint MWL/IIRO envoy to Afghanistan in 2000 at the direction of Jelaidan. Accordingly, Madani has knowledge and information regarding: (i) IIRO's relationship with, and employment of, Jelaidan; and (ii) the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. **Stuart A. Levey**
Address: Upon information and belief, the individual can be contacted through HSBC, 8 Canada Square, 42nd Floor, London, E14 5HQ, United Kingdom.
Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of Jelaidan and Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including: (i) the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida;" and (ii) the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida."

21. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through Green River Hollow Consulting, 446 Overlook Drive, Hillsdale, NY 12529.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of Jelaidan and Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of Jelaidan and Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including: (i) the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida;" and (ii) the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida."

23. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of Jelaidan and Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including: (i) the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida;" and (ii) the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida."

24. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of Jelaidan and Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including: (i) the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida;" and (ii) the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida."

25. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20036.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of Jelaidan and Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including: (i) the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida;" and (ii) the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida."

26. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Center for Security Studies ("CSS"), but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief

of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps. Moreover, Mr. Scheuer has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

27. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Mr. Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Mr. Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Mr. Fitzgerald has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Mr. Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps. Moreover, Mr. Fitzgerald has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

28. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Roth has knowledge and information regarding Jelaidan’s pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

29. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Suite 1000, Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Greenburg has knowledge and information regarding Jelaidan’s pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

30. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other

documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Ms. Wille has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

E. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of Dubai Islamic Bank ("DIB"). Individuals include, but are not limited to:

1. Saeed Ahmed Lootah
Address: Upon information and belief, the individual can be contacted through Dubai Islamic Bank.
Subject: Mr. Lootah is a co-founder and leading shareholder of Dubai Islamic Bank ("DIB"). Mr. Lootah was identified by Jamal al Fadl as one of al Qaeda's contacts at DIB. As a result of his long-standing relationship with the bank, Mr. Lootah has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11, 2001 hijackers; (iii) DIB accounts that were frozen following the September 11, 2001 attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Mr. Lootah has knowledge and information regarding his own relationship with al Qaeda members such as Saidi Madani al Tayyib, and any financial services DIB provided to al Tayyib and other members and/or sympathizers of al Qaeda.
2. Dr. Hussain Hamid Hassan
Address: Upon information and belief, the individual can be contacted through Dubai Islamic Bank.
Subject: Dr. Hassan is the current Chairman of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Hassan has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Hassan further has knowledge and information regarding the

allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11, 2001 hijackers; (iii) DIB accounts that were frozen following the September 11, 2001 attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Hassan has knowledge and information regarding his relationship with Abdullah Azzam, co-founder of al Qaeda and spiritual mentor to Osama bin Laden.

3. Dr. Ajeel Jassem Nashmi

Address: Unknown.

Subject: Dr. Nashmi is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Nashmi has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Nashmi further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11, 2001 hijackers; (iii) DIB accounts that were frozen following the September 11, 2001 attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Nashmi has knowledge and information regarding his own statements and/or publications advocating jihad.

4. Sheikh Mohammed Abdul Razak Alsidiq

Address: Unknown.

Subject: Sheikh Alsidiq is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Alsidiq has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Sheikh Alsidiq further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11, 2001 hijackers; (iii)

DIB accounts that were frozen following the September 11, 2001 attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Sheikh Alsidiq has knowledge and information regarding his own statements and/or publications advocating jihad.

5. Sheikh Ali Muhsein al Din Qaradaghi

Address: Unknown.

Subject: Sheikh Qaradaghi is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Qaradaghi has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Sheikh Qaradaghi further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11, 2001 hijackers; (iii) DIB accounts that were frozen following the September 11, 2001 attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Sheikh Qaradaghi has knowledge and information regarding his own statements and/or publications advocating jihad.

6. Sheikh Yusuf al Qaradawi

Address: Unknown.

Subject: Sheikh Qaradawi is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Qaradawi has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Moreover, Sheikh Qaradawi has knowledge and information regarding his own statements and/or publications advocating jihad.

7. Dr. Mohammed Abdul Hakim Zoeir

Address: Upon information and belief, the individual can be contacted through Dubai Islamic Bank.

Subject: Dr. Zoeir is a member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Zoeir has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Zoeir further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts

used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11, 2001 hijackers; (iii) DIB accounts that were frozen following the September 11, 2001 attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

8. Dr. Ahmad Muhammad Ahmad Khalil

Address: Unknown.

Subject: Dr. Khalil is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Khalil has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Khalil further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden and others to launder and transfer money used for terrorist activities; and (ii) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

9. Dr. Rashid Abdullah Taha

Address: Unknown.

Subject: Dr. Taha is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Taha has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Taha further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden and others to launder and transfer money used for terrorist activities; and (ii) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

10. Sheikh Muhammad Abdullah al Khatib

Address: Unknown.

Subject: Sheikh Khatib is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Khatib has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Sheikh Khatib further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and

material support to Osama bin Laden and his al Qaeda associates, including but not limited to, DIB accounts used by, or for the benefit of, Osama bin Laden and others to launder and transfer money used for terrorist activities.

11. Dr. Fathi Lashin
Address: Unknown.
Subject: Dr. Lashin is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Lashin has knowledge and information regarding the Board's supervision and control over DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Lashin further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to, DIB accounts used by, or for the benefit of, Osama bin Laden and others to launder and transfer money used for terrorist activities.

12. As Yet Unidentified Members of DIB's Board of Directors Responsible for Selecting Members of DIB's Fatwa and Shariah Supervisory Board.
Address: Upon information and belief, the individual(s) can be contacted through Dubai Islamic Bank.
Subject: As yet unidentified members of DIB's Board of Directors who were responsible for selecting and appointing members of DIB's Fatwa and Shariah Supervisory Board from 1992-2004, including but not limited to, Dr. Hussain Hamid Hassan, Dr. Ajeel Jassem Nashmi, Sheikh Mohammed Abdul Razak Alsidiq, and Sheikh Ali Muhsein al Din Qaradaghi.

13. Sultan bin Nasser al Suwaidi
Address: Upon information and belief, the individual can be contacted through the International Monetary Fund in Washington, D.C.
Subject: Suwaidi served as the Governor of the Central Bank of the United Arab Emirates from 1991-2014. In that capacity, Suwaidi has knowledge and information concerning: (i) any and all directives issued by the Central Bank to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (ii) all accounts at DIB that were ordered frozen following the September 11, 2001 attacks; (iii) DIB's response to any such inquiries, directives or orders from the Central Bank; and (iv) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism.

14. Mohamed Saeed Ahmed Abdulla al Sharif
Address: Upon information and belief, the individual can be contacted through Dubai Islamic Bank.
Subject: Sharif served as the Chairman of DIB's Board of Directors. In that capacity, Sharif has knowledge and information concerning: (i) the operations, policies, and activities of DIB; (ii) any and all directives issued by the Central Bank

to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (iii) all accounts at DIB that were ordered frozen following the September 11, 2001 attacks; (iv) DIB's response to any such inquiries, directives or orders from the Central Bank; and (v) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism.

15. Butti Khalifa bin Darwish al Falasi

Address: Upon information and belief, the individual can be contacted through Dubai Islamic Bank.

Subject: Falasi served as DIB's Chief Executive Officer. In that capacity, Falasi has knowledge and information concerning: (i) the operations, policies, and activities of DIB; (ii) any and all directives issued by the Central Bank to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (iii) all accounts at DIB that were ordered frozen following the September 11, 2001 attacks; (iv) DIB's response to any such inquiries, directives or orders from the Central Bank; (v) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism; and (vi) any investigation conducted relative to Ali Abdul Aziz Ali, including inquiries from the U.S. government regarding accounts linked to Ali Abdul Aziz Ali.

16. Zuhair Saeed al Rabii

Address: Upon information and belief, the individual can be contacted through Dubai Islamic Bank.

Subject: Rabii has served as the head of Financial Security at DIB and further served as the head of the Central Operations Directorate which coordinated DIB's efforts to combat money laundering. In those capacities, Rabii has knowledge and information concerning DIB's anti-money laundering ("AML"), combatting terrorism financing ("CTF"), and know-your-customer ("KYC") policies and procedures. Rabii further has knowledge and information regarding training of DIB personnel in AML, CTF and KYC policies and procedures, DIB's account opening procedures, software or internet-based applications used by DIB for monitoring and detecting money-laundering, terrorist financing, or suspicious activities, DIB's policies, procedures, and compliance with suspicious transaction reporting or suspicious activity reporting, and internal and external auditing of DIB's AML, CTF, KYC policies and practices.

17. Muhammad Abd al Rahman al Amiri

Address: Unknown.

Subject: Amiri served as the Director of DIB's Central Operations Directorate. Accordingly, Amiri has knowledge and information concerning: (i) the operations, policies, and activities of DIB; (ii) any and all directives issued by the Central Bank to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (iii) all accounts at DIB that

were ordered frozen following the September 11, 2001 attacks; (iv) DIB's response to any such inquiries, directives or orders from the Central Bank; and (v) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism.

18. As Yet Unidentified DIB Personnel Responsible for Reviewing, Investigating, and Responding to Directives Issued by the Central Bank of the U.A.E.
Address: Upon information and belief, the individuals can be contacted through Dubai Islamic Bank.
Subject: As yet unidentified DIB personnel responsible for: (i) reviewing circulars issued by the Central Bank of the U.A.E. concerning the investigation of banking and financial accounts linked to terrorism and/or criminal activities, and the freezing of any such accounts; (ii) conducting internal investigations at DIB in response to the directives received from the Central Bank of the U.A.E., including audits; and (iii) responding to the Central Bank of the U.A.E. on behalf of DIB concerning the results of those internal investigations and/or audits. As yet unidentified DIB personnel include those individuals who are responsible for the handwritten notations on the Central Bank circulars produced by DIB, including but not limited to, DIB003242-44, 3245-49, 3435-38, 3558-82.
19. Hashem Abdullah al Dabel
Address: Unknown.
Subject: Dabel served as the Director of DIB's Branches Directorate. Accordingly, Dabel has knowledge and information concerning: (i) the operations, policies, and activities of DIB; and (ii) the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
20. Maruan Qassam Naqwa
Address: Unknown.
Subject: Naqwa served as the head of DIB's General Accounting Division. Accordingly, Naqwa has knowledge and information concerning: (i) the operations, policies, activities, and accounting practices of DIB; and (ii) the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
21. Walid Zaki Muhammad Isa
Address: Unknown.
Subject: Isa served as an auditor in DIB's Internal Auditing Directorate. Accordingly, Isa has knowledge and information concerning: (i) the operations, policies, activities, and auditing practices of DIB; and (ii) the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. Dr. Khalifa Mohammed Sulaiman
Address: Unknown.
Subject: Dr. Sulaiman served as the Director of H.H. The Ruler of Dubai's Court (The Diwan). Accordingly, Dr. Sulaiman has knowledge and information concerning: (i) any and all directives issued by the Central Bank to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (ii) all accounts at DIB that were ordered frozen following the September 11, 2001 attacks; (iii) DIB's response to any such inquiries, directives or orders from the Central Bank; and (iv) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism.
23. As Yet Unidentified Participants in the July 1999 Meeting(s) in the United Arab Emirates Involving U.S. Officials and Representatives of the Government of the United Arab Emirates.
Address: Unknown.
Subject: As yet unidentified individuals from the U.S. government, U.A.E. government, Central Bank of the U.A.E., and/or DIB having information and knowledge concerning the meeting(s) held in or around July 1999 in the U.A.E. involving U.S. officials and representatives of the U.A.E. government, relative to claims that Osama bin Laden and al Qaeda was allowed to "funnel money through the Dubai Islamic Bank" with the approval of DIB officials.
24. As Yet Unidentified Participants in the 1998 Meeting(s) Involving U.S. Officials and Representatives of the Government of the United Arab Emirates.
Address: Unknown.
Subject: As yet unidentified individuals from the U.S. government, U.A.E. government, Central Bank of the U.A.E., and/or DIB having information and knowledge concerning the meeting(s) held in or around 1998 involving U.S. officials and representatives of the U.A.E. government, relative to claims that certain accounts at DIB were used to facilitate the movement of money intended for the 1998 U.S. Embassy bombings in Kenya and Tanzania.
25. As Yet Unidentified DIB Personnel Responsible for Opening Accounts for Osama Bin Laden and Other Members of Al Qaeda.
Address: Upon information and belief, the individuals can be contacted through Dubai Islamic Bank.
Subject: As yet unidentified DIB personnel responsible for opening and servicing accounts at DIB for Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, Said Madani al Tayyib, Mamdouh Mahmud Salim, and other members of al Qaeda, have information and knowledge regarding DIB's account opening procedures; anti-money laundering ("AML"), combatting terrorism financing ("CTF"), and know-your-customer ("KYC") procedures and other due diligence efforts that were undertaken when opening those accounts; any examination or auditing of those accounts that were conducted; and any investigation of those accounts that were conducted by DIB as a result of suspicious activities.

26. Ebrahim Fayeze
Address: Unknown.
Subject: Fayeze served as a member of DIB's Board of Directors and was involved in DIB's dispute with the New York Times concerning a July 8, 1999 article authored by James Risen and Benjamin Weiser. Accordingly, Fayeze has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
27. Alan S. Fine
Address: Upon information and belief, the individuals can be contacted through Dubai Islamic Bank.
Subject: Fine served as counsel in relation to DIB's dispute with the New York Times concerning a July 8, 1999 article authored by James Risen and Benjamin Weiser. Accordingly, Fine has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
28. William L. Richey
Address: Upon information and belief, the individuals can be contacted through Dubai Islamic Bank.
Subject: Richey served as counsel in relation to DIB's dispute with the New York Times concerning a July 8, 1999 article authored by James Risen and Benjamin Weiser. Accordingly, Richey has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
29. Mustafa Ahmed al Hawsawi
Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.
Subject: In addition to managing bank accounts for, and/or for the benefit of, Osama bin Laden himself, DIB provided financial services to al Qaeda's financial officer, Mustafa Ahmed al Hawsawi. Prior to the September 11, 2001 attacks, Hawsawi used his accounts at DIB to deposit approximately \$148,895 USD into bank accounts in Dubai that were held by two of the 9/11 hijackers, including at least one account at DIB. Additionally, in the days just prior to the attacks, the 9/11 hijackers were returning their unused funds to Hawsawi in the U.A.E. Mohamed Atta wired at least \$7,860 back to Hawsawi on September 8, 2001. On September 9, 2001, hijacker Waleed al Shehri wired \$5,000 to Hawsawi. The day before the attack on September 10, 2001, hijacker Marwan al Shehhi wired \$5,400 to Hawsawi. Accordingly, Hawsawi has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.

30. Ali Abdul Aziz Ali
Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.
Subject: Khalid Sheikh Mohammed's nephew, Ali Abdul Aziz Ali (a/k/a Ammar al Baluchi), was instrumental in providing financial and travel assistance for the September 11, 2001 plot via his account(s) at DIB. According to the 9/11 Commission Final Report, Ali transferred \$5,000 to 9/11 hijackers Nawaf al Hazmi and Khalid al Mihdhar in California. Ali was similarly sending funds to the al Qaeda cell in Hamburg, Germany. The 9/11 Report states that the Hamburg operatives paid for their flight training primarily with funds wired from Dubai by KSM's nephew. Between June 29 and September 17, 2000, Ali sent Marwan al Shehhi and Mohamed Atta a total of \$114,500 in five transfers ranging from \$5,000 to \$70,000. Department of Defense Unclassified Summaries of Evidence for detainees incarcerated at Guantanamo Bay, including Ali himself, confirm that Ali opened an account at DIB. Accordingly, Ali has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.
31. Khalid Sheikh Mohammed
Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.
Subject: Khalid Sheikh Mohammed ("KSM") is a former senior member of al Qaeda and the mastermind of the September 11, 2001 attacks. In furtherance of al Qaeda's objective to attack the United States on September 11, 2001, and pursuant to KSM's instructions, Ali Abdul Aziz Ali (KSM's nephew) provided financial and travel assistance to the 9/11 hijackers via his account(s) at DIB. Accordingly, KSM has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.
32. Said Madani al Tayyib
Address: Unknown.
Subject: Tayyib is a former senior member of al Qaeda who served as al Qaeda's "chief financial officer" during the early 1990s at the same time Osama bin Laden was building his Islamic army in Sudan. Tayyib held at least two accounts at DIB. Jamal al Fadl, a former al Qaeda official who became a cooperating witness for the United States, provided the FBI with key details regarding Tayyib's tenure as bin Laden's trusted advisor. According to Fadl, Tayyib was "in charge of most of Osama bin Ladin's money, including the money located outside of Sudan." Accordingly, Tayyib has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates.

33. Mamdouh Mahmud Salim
Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.
Subject: Salim is a founding member of al Qaeda responsible for managing terrorist training camps in Afghanistan and Pakistan and undertaking efforts to obtain nuclear weapons for al Qaeda. Salim was arrested by German authorities on September 16, 1998 for his role in the 1998 Embassy bombings. At the time of his arrest, Salim had three separate DIB accounts. Accordingly, Salim has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates.
34. Ali Salah Muhammad Kahlah al Marri
Address: Unknown.
Subject: Marri is a former member of al Qaeda who trained at al Qaeda terrorist training camps. Before traveling to the United States prior to the 9/11 attacks as instructed by Khalid Sheikh Mohammed, Marri met with Mustafa Ahmed al Hawsawi in Dubai who gave him \$10,000 for his mission. Accordingly, Salim has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.
35. Ahmed Nur Ali Jumale
Address: Unknown.
Subject: Jumale is an al Qaeda financier designated by the Treasury Department on November 7, 2001 for his links to Osama bin Laden. Jumale, including a number of his designated businesses that make up the Al Barakaat financial and telecommunications conglomerate, held accounts at DIB. According to the Treasury officials, Jumale used the Al Barakaat group of companies "to transmit funds, intelligence and instructions" to al Qaeda and other terrorist organizations. Accordingly, Jumale has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and al Qaeda.
36. Yassin Kadi
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Kadi was designated as a Specially Designated Global Terrorist ("SDGT") by the U.S. Treasury Department on October 12, 2001. According to the U.S. government, Kadi "has funded terrorist and extremist individuals and operations." Kadi has been active in the business and charitable sectors in Saudi Arabia, Pakistan, Sudan, the Balkans, Albania, Switzerland, and other countries for several decades, and has used those entities to transfer funds to accounts at DIB. Accordingly, Kadi has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and al Qaeda.

37. **Ahmed Ali Lootah**
Address: Upon information and belief, the individual can be contacted through Dubai Islamic Bank.
Subject: Jamal al Fadl, a former al Qaeda official who became a cooperating witness for the United States, provided testimony during the 1998 U.S. Embassy bombing trial, *United States v. Usama Bin Laden, et al.*, Case No. S(7) 98 Cr. 1023 (S.D.N.Y.) (February 6, 2001), stating that Lootah shared an account with al Qaeda member Khalifa al Omani. Accordingly, Lootah has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and al Qaeda.
38. **Jamal al Fadl**
Address: Upon information and belief, the individual is currently in witness protection and can be contacted through the U.S. Department of Justice.
Subject: Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Fadl has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and al Qaeda. Details of Fadl's knowledge are presented in his publicly available interrogation, interviews, court testimony, and FBI 302 statements.
39. **Sheikh Mohamed bin Saqar**
Address: Unknown.
Subject: According to the German government, on multiple occasions Sheikh Saqar authorized the transfer of funds from his account at DIB to the Third World Relief Agency's bank account in Vienna, Austria. *See* Expert Report of the Federal Office of Criminal Investigation relating to the judicial assistance request, ref. no. INV/10289/T09-PH(245), dated 8/27/2002 of the "Office of the Prosecutor" (OTP) of the International Court of Criminal Justice for the former Yugoslavia relating to the "Third World Relief Agency" (TWRA), Vienna/Austria, pp. 19, 20, and 57. The 9/11 Commission concluded that Osama bin Laden used the TWRA to "covertly provide financial and other support for terrorist activities." *See* 9/11 Report at p. 58. Accordingly, Saqar has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and al Qaeda.
40. **Khalid Amer Ballayth**
Address: Unknown.
Subject: Described by the Swiss Federal Judicial Police as "a close associate of Osama bin Laden," Ballayth held an account at DIB. Accordingly, Ballayth has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and al Qaeda.

41. Yasin Ahmed Mohamed Ali
Address: Unknown.
Subject: Mr. Ali worked as an officer of several corporate entities owned by Yassin Kadi and held an account at DIB. Accordingly, Ali has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and al Qaeda.
42. Michael F. Scheuer
Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.
Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Center for Security Studies ("CSS"), but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda, including bin Laden's use of certain Middle Eastern banks to launder and distribute funds for terrorist activities; and (ii) the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, the Taliban, al Qaeda, and affiliated terrorist organizations.
43. Dubai Islamic Bank ("DIB")
Address: DIB is represented by Jones Day, 51 Louisiana Avenue, N.W., Washington, D.C. 20001.
Subject: Representative(s) designated by DIB to testify to matters to be described in plaintiffs' Notice of Rule 30(b)(6) Deposition.
44. Federal Bureau of Investigation ("FBI")
Address: The FBI is located at 935 Pennsylvania Avenue, N.W., Washington, D.C. 20535.
Subject: Representative(s) designated by the FBI to testify pursuant to Rule 30(b)(6), relevant to the claims against DIB.
45. U.S. Department of the Treasury
Address: The Treasury Department is located at 1500 Pennsylvania Avenue, N.W., Washington, D.C. 20220.
Subject: Representative(s) designated by the Treasury Department to testify pursuant to Rule 30(b)(6), relevant to the claims against DIB.
46. U.S. Department of State
Address: The State Department is located at 2201 C Street, N.W., Washington, D.C. 20520.

Subject: Representative(s) designated by the State Department to testify pursuant to Rule 30(b)(6), relevant to the claims against DIB.

47. Central Intelligence Agency (“CIA”)
Address: The CIA is located at 1000 Colonial Farm Road, Langley, VA 22101.
Subject: Representative(s) designated by the CIA to testify pursuant to Rule 30(b)(6), relevant to the claims against DIB.
48. U.S. Department of Defense (“DOD”)
Address: The DOD is located at The Pentagon, Washington, D.C. 22202.
Subject: Representative(s) designated by the DOD to testify pursuant to Rule 30(b)(6), relevant to the claims against DIB.
49. National Security Council (“NSC”)
Address: The NSC is located at the Eisenhower Executive Office Building, Washington, D.C. 20504.
Subject: Representative(s) designated by the NSC to testify pursuant to Rule 30(b)(6), relevant to the claims against DIB.

Dated: March 9, 2018

Respectfully submitted,

/s/ _____
J. Scott Tarbutton, Esq. on behalf of
Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Amended Witness Disclosure Pursuant to the Court's January 31, 2018 Deposition Protocol Order (ECF No. 3894) was filed electronically this 9th day of March 2018. Notice of this filing will be sent to all parties in 03 MDL 1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system. Parties may access this filing through the Court's ECF system.

/s/

J. Scott Tarbutton, Esq.